

MA & R

MILLER ALFANO & RASPANTI P.C.

September 7, 2006

Via Facsimile and First Class Mail

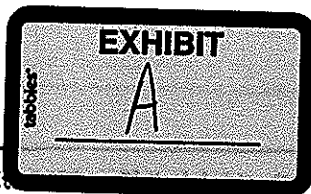
Robert Sugarman, Esquire  
Sugarman & Associates  
Robert Morris Building - 11<sup>th</sup> Floor  
100 North 17<sup>th</sup> Street  
Philadelphia, PA 19103

Re: Pennsylvania Board of Probation and Parole/Watkins  
Pennsylvania Board of Probation and Parole/Roadcloud  
Pennsylvania Board of Probation and Parole/Dayton  
Pennsylvania Board of Probation and Parole/Clemente

Dear Bob:

As we discussed on September 5, 2006, the Defendants in these cases are willing to take the depositions of the following witnesses one time, for purposes of both cases:

1. Robin Taylor
2. Bonnietta Ferguson
3. Dana Roth
4. William Hodge
5. Victoria Roadcloud
6. Rosalind Russ-Tobias
7. Ronald Zappan
8. Howrhu Self
9. Darryl Rankin
10. Henry Williams
11. Ernest Holmes
12. Chantolees Mirman
13. Martha Holman
14. Joseph Scott
15. James Newton
16. Hugh Young
17. Susan Dannenenerg
18. Mark Weinstein
19. Lloyd Knight
20. Willie Miller



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Robert Sugarman, Esquire  
September 7, 2006  
Page 2

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We already have dates for Ms. Roadcloud and Ms. Holman as they were scheduled with you, Mr. Henzes and Ms. Hobbs for the matters other than Watkins. Lisa or I will participate on those dates for the Watkins matter.

We need dates for the rest of the witnesses. We had suggested dates previously in our August 30, 2006 letter, a copy of which is enclosed for your convenience. You can ignore the dates in that letter for the depositions of Ms. Roadcloud and Ms. Holman as they will now be deposed on October 24, 2006 and October 23, 2006, respectfully.

I would like to lock-up these dates for the rest of these witnesses by September 11, 2006. Please call me to discuss. This should eliminate the concerns raised in your September 6, 2006 letter.

If I misstated anyone's understanding, please let me know.

Very truly yours,



GINO J. BENEDETTI

GJB/ma

cc: Linda Laub, Esquire  
Randall J. Henzes, Esquire  
Lisa R. Marone, Esquire  
Jody M. Hobbs, Esquire

**MA&R****MILLER ALFANO & RASPANTI P.C.**

September 14, 2006

VIA FACSIMILE & FIRST CLASS MAIL

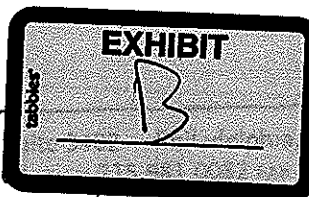
Robert Sugarman, Esquire  
 Robert Morris Building - 11<sup>th</sup> Floor  
 100 North 17<sup>th</sup> Street  
 Philadelphia, PA 19103

Re: Henry Watkins v. Pennsylvania Board of Probation and  
 Parole, Edward Jones, and Michael Bukata  
C.C.P. Philadelphia County, No. 002927

Dear Mr. Sugarman:

In accordance with your letter of September 12, 2006, wherein you provided your availability for depositions, enclosed please find deposition notices for the following individuals on the following dates:

<u>Witness</u>	<u>Date</u>	<u>Time</u>
Bonietta Ferguson	October 11, 2006	1:00 P.M.
Henry Williams	October 11, 2006	3:30 P.M.
Robin Taylor	October 16, 2006	10:00 A.M.
Ernest Holmes	October 16, 2006	12:30 P.M.
Dana Roth	October 17, 2006	1:00 P.M.
Joseph Scott	October 17, 2006	3:30 P.M.
James G. Newton	October 18, 2006	3:30 P.M.
William Hodge	October 19, 2006	3:30 P.M.
Chantal-Lisa Mirman	October 20, 2006	1:30 P.M.
Hugh Young	October 20, 2006	3:30 P.M.
Martha Holman	October 23, 2006	See Below
Victoria E. Roadcloud	October 24, 2006	See Below
Susan R. Dannenberg	October 25, 2006	10:00 A.M.
Darryl Rankin	October 25, 2006	12:30 A.M.
Ronald Zappan	October 26, 2006	3:30 P.M.
Howrhu Self	October 27, 2006	1:00 P.M.
Rosalind Russ-Tobias	October 27, 2006	3:30 P.M.
Willie Miller	November 1, 2006	10:00 A.M.



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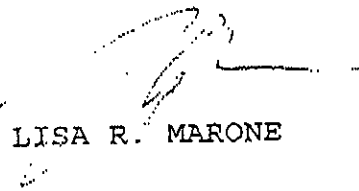
Robert Sugarman, Esquire  
September 14, 2006  
Page 2

Please note that Martha Holman and Victoria E. Roadcloud are both scheduled to appear at our offices for depositions in the Roadcloud matter on October 23, 2006 and October 24, 2006 respectively. For the convenience of these two individuals as well as yourself, we plan to depose each in this matter following the completion of these witnesses depositions in the Roadcloud matter on those days.

Please let us know if subpoenas are necessary for any of the above individuals whom your office represents either currently or in the past. If we do not hear from you, we will assume that the witnesses will appear without the issuance of a subpoena. The depositions will take place in our office and we will supply the court reporter.

Should you have any problems or concerns with this arrangement please contact our office at (215) 972-6400. Thank you for your prompt attention to this matter.

Very truly yours,



LISA R. MARONE

LRM/jam

Enclosure

cc: Gino J. Benedetti, Esquire (w/encl.)



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

TOM CORBETT  
ATTORNEY GENERAL

September 25, 2006

21 S. 12<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Philadelphia, PA 19107-3603  
Telephone: (215) 560-2136  
Fax: (215) 560-1031

Robert Sugarman, Esquire  
Robert Morris Building  
100 North 17<sup>th</sup> Street, 11<sup>th</sup> Floor  
Philadelphia, PA 19103

RE: Roadcloud v. Jones, et al.  
Civil Action No. 05-3787  
Roadcloud v. Jones, et al.  
Civil Action No. 06-2235

Dear Mr. Sugarman:

In response to your letter dated September 21, 2006, you know my position on this issue. It has not changed.

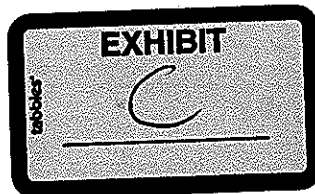
Very truly yours,

A handwritten signature in cursive script, reading "Randall J. Henzes".

Randall J. Henzes  
Deputy Attorney General

RJH/am

cc: Jodeen Hobbs, Esquire



SUGARMAN & ASSOCIATES, PC

ATTORNEYS AT LAW  
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BUCKS COUNTY OFFICE  
215-348-8786

\*Also admitted in NY, DC

September 21, 2006

Randall J. Henzes, Esquire  
Deputy Attorney General  
Commonwealth of Pennsylvania  
21 S. 12<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Philadelphia, PA 19107-3603

RE: Roadcloud, et al. v. Pennsylvania Board of  
Probation & Parole, et al., Civil Action No. 05-3787  
and No. 06-2235

Dear Randall:

In response to your September 6 letter, I am a little confused. If your desire is to ~~protect your right to ask questions~~ on behalf of your clients, we readily agree; it can be a joint deposition. It was Mr. Benedetti who responded to my suggestion by stating that the depositions in the Watkins case would be considered deposition in both cases. This in no way precludes you from asking questions, as you like, as long as they are not repetitive.

Does this resolve your problem? Please advise by Monday, as otherwise we will be filing a Motion.

Sincerely,



Robert J. Sugarman

RJS:sas